



August 16, 2000

Mr. Paul Peronard
US EPA
EPR-SA
999 18th St, Suite 500
Denver, CO 80202

Mr. Paul Peronard
US EPA
501 Mineral Avenue
Libby, Montana 59923

Re: **Addendum 1 to Approved Work Plan dated July 28, 2000**
Libby Asbestos Site (#8-BC), Libby, Lincoln County, Montana

Dear Mr. Peronard:

Enclosed for insertion in the Approved Work Plan of July 28 is Approved Addendum 1.

Respectfully,

A handwritten signature in black ink that reads "Jim Stout for J. Stout".

Jim Stout
Project Coordinator
Libby Asbestos Site

cc: Jon Constan, Montana Department of Environmental Quality (3 copies)
Ken Lund, Holme Roberts & Owen
Bob Mariam, WR Grace
David Cleary, WR Grace
Karen Brown, WR Grace
Matthew Cohn, US EPA

ADDENDUM NO. 1**Work Plan – Removal of Asbestos and Vermiculite at the Libby Asbestos Site****28 July 2000**

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the sequence of performing cleaning activities for the Planer Shop, while maintaining the safety of the public and contractor personnel.

On 1 August 2000, the EPA, Millwork West and WR Grace reached an agreement that the planing operations can be immediately shut down until September 4, 2000. This enables an early start on the cleaning of the planer shop, shed, and planer provided that the building (shop and shed) be prepared and isolated as a restricted zone from all other parts of the property and public use and access.

URS proposes to accomplish this in strict adherence to the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation reporting to assure the EPA that the early start in cleaning operations were performed in a manner protecting the public and allowing Millwork West to continue other site operations until relocated to the new temporary pole barn structures (Section 2.1.6 of the Work Plan) off Highway 2 scheduled for installation completion 1 September 2000.

To accomplish the cleaning, URS and its subcontractors ACandS and Koch Environmental Health, Inc. (KEH) will isolate the planer shop and shed from all other site areas and activities by installing critical barriers at all openings of the planer shop and shed per the building cleanup/decontamination procedures (Appendix D, Section 3.5). The personnel decontamination unit (Appendix D, Section 2.1) will be constructed and personnel access and egress will be restricted to this one entrance. Street clothes will be doffed and donned in the clean room.

The building exterior walls will become the boundary of an isolated restricted zone in the western portion of the site (Figure 2.1). This will not restrict Millwork West's utilization of access roads or other property areas.

In accordance with Appendix A (Sampling and Analysis Plan), KEH will implement for the Planer Shop cleanup operations, appropriate removal area and monitoring point (i.e., clean

rooms, exhaust fans, etc.) sampling activities. ACandS and KEH will also monitor personnel per the Health and Safety Plan.

Upon completion of cleaning, all critical barriers will be left in place and the negative air machines (Appendix D, Section 3.7) will be left in operation. Final clearance sampling will not be conducted (Appendix A, Section 2.3) until after exterior soils in the western area are removed and the EPA agrees that exterior operations should not result in recontamination with asbestos or vermiculite particles.

All materials removed will be bagged and/or contained in sealed containers per Appendix D and left on site for later removal after set-up of the full site exclusion zone. At that time per all other applicable procedures of the Work Plan, transportation for disposal would begin.

This early start on the planer and planer shop, in lieu of the small shed, enables WR Grace to proceed rapidly with work activities, assuring completion per the schedule limits, not adversely affecting the Millwork West retail business, and protects the health and safety of the public, agency, or contractor personnel.

Activities initiating containment will begin 4 August 2000. Complete cleaning of Planer, Planer Shop and shed internals are scheduled for 2 September 2000.

APPROVED

